

NO. 13-20-00125-CV
(CONSOLIDATED WITH: NO. 13-20-00126-CV; NO. 13-20-00127-CV)

FILED IN
13th COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS
9/10/2020 10:18:59 AM
KATHY S. MILLS
Clerk

IN THE COURT OF APPEALS
FOR THE THIRTEENTH JUDICIAL DISTRICT OF TEXAS
AT CORPUS CHRISTI

Dr. Lalitha Madhav Janaki

Appellant

v.

C.H. Wilkinson Physician Network d/b/a Christus Physician Group, Christus Spohn Hospital – Corpus Christi and Christus Spohn Hospital Corpus Christi – Shoreline, and Christus Spohn Cancer Center – Calallen and Christus Spohn Cancer Center – Shoreline

Appellees

Appeal from the 319th Judicial District Court
Of Nueces County, Texas
Cause No. 2017-DCV-4930-G

APPELLANT’S MOTION TO EXTEND TIME TO FILE
REPLY BRIEF-UNOPPOSED

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Counsel for Appellant Dr. Lalitha Madhav Janaki

**APPELLANT’S MOTION TO EXTEND TIME TO FILE
REPLY BRIEF-UNOPPOSED**

TO THE HONORABLE JUSTICES OF THE FIRST COURT OF APPEALS:

Appellant, Lalitha Janaki, files this Unopposed Motion for Extension of Time to File Reply Brief as follows:

Motion

1. Appellant, Lalitha Janaki, requests a seven (7) day extension of the deadline to file her Reply Brief from the current deadline of September 14, 2020 to September 21, 2020. This is Appellant’s first request for an extension to file this brief, and Appellee is unopposed to this request.
2. Counsel makes this request as he had to tend to the unexpected and emergent hospitalization of his octogenarian father which became more complicate than it ordinarily would have because of the COVID 19 pandemic. Though he has fortunately been released, the undersigned has lost preparation time to compose the brief and would prefer to ask for this extension in advance as opposed to doing it at the last minute should the need arise.
3. Appellant, Lalitha Janaki, requests a seven (7) day extension to file her reply brief in order to have time to thoroughly and appropriately reply to the argument presented in Appellees’ brief. This request is not made for purposes of delay, but so that justice may be done.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Appellant requests the granting of an extension for the filing of Appellant's Reply Brief to September 21, 2020.

Respectfully submitted,

/s/ Gregg M. Rosenberg

Gregg M. Rosenberg

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Attorney-in-Charge for Appellant

CERTIFICATE OF CONFERENCE

Prior to filing this Appellant's Motion To Extend Time To File Reply Brief-Unopposed I conferred with Daphne Calderon, Appellee's counsel, and based on such, advise the Court that Appellee is unopposed to this motion.

/s/ Gregg M. Rosenberg

Gregg M. Rosenberg

CERTIFICATE OF SERVICE

I certify that on **September 9, 2020**, the foregoing document was served, via email to:

Daphne Andritsos Calderon
Yvonne K. Puig
Norton Rose Fulbright
98 San Jacinto Blvd, Suite 1100
Austin, Texas 78701

/s/ Gregg M. Rosenberg
Gregg M. Rosenberg

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Kristina Blanco on behalf of Gregg M. Rosenberg
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Status as of 9/10/2020 10:32 AM CST

Associated Case Party: LalithaMadhavJanaki

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